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Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

CALVARY CHAPEL SAN JOSE, a California
Non-Profit Corporation; **PASTOR MIKE
MCCLURE**, an individual; **SOUTHRIDGE
BAPTIST CHURCH OF SAN JOSE
CALIFORNIA dba SOUTHRIDGE CHURCH**,
a California Non-Profit Corporation; **PASTOR
MICAIAH IRMLER**, an individual;

Plaintiffs,

vs.

GAVIN NEWSOM, in his official capacity as the
Governor of California, **TOMAS ARAGON
M.D.**, in her official capacity as the Acting
California Public Health Officer; **SANTA CLARA
COUNTY**; **SARA H. CODY, M.D.**, in her
official capacity as Santa Clara County Public
Health Officer; **MIKE WASSERMAN**, in his
official capacity as a Santa Clara County
Supervisor; **CINDY CHAVEZ**, in her official
capacity as a Santa Clara County Supervisor;
DAVE CORTESE, in his official capacity as a
Santa Clara County Supervisor; **SUSAN
ELLENBERG**, in her official capacity as a Santa
Clara County Supervisor; **JOE SIMITIAN**, in his
official capacity as a Santa Clara County
Supervisor; and **THE SANTA CLARA COUNTY
BOARD OF SUPERVISORS**;

Defendants.

Case No. 20-cv-03794

**JOINT STIPULATION TO EXTEND
EXPERT DISCOVERY DEADLINES; AND
~~PROPOSED~~ ORDER**

Pursuant to Civil Local Rule 6-2, the parties hereby agree and stipulate to the following:

WHEREAS the current deadline for disclosure of rebuttal expert reports is December 30, 2022. *See* ECF No. 245.

WHEREAS the current deadline for expert discovery cut-off is January 20, 2023. *Id.*

WHEREAS Santa Clara County (“the County”) recently filed a motion for partial summary judgment. *See* ECF No. 253. Pursuant to this Court’s Local Rules, Plaintiffs must file an opposition by January 5, 2023, and the County must file its reply brief on January 12, 2023.

WHEREAS the parties agree to extend the deadline for disclosure of rebuttal reports to January 30, 2023, and the overall deadline for expert discovery to March 3, 2023.

WHEREAS there is good cause to extend the expert deadlines to facilitate further settlement discussions and to accommodate the schedules of counsel and expert witnesses.

The parties have agreed to numerous extensions in this case. *See, e.g.*, ECF 52, 77, 100, 103, 107, 118, 142, 148, 168, 180, 216, 218, 228, 245.

Accordingly, for good cause shown, the parties stipulate and respectfully request the Court enter an order extending the expert discovery cut-off as set forth above and in the proposed order submitted herewith.

IT IS SO STIPULATED.

Respectfully submitted,

JAMES R. WILLIAMS
County Counsel

Dated: December 23, 2022

/s/ Robin M. Wall

Robin M. Wall, Esq.
Attorney for Cross-Defendants

ADVOCATES FOR FAITH AND FREEDOM

Dated: December 23, 2022

/s/ Mariah Gondeiro

Mariah Gondeiro, Esq.
Attorney for Plaintiffs

~~PROPOSED~~ ORDER

The Court, having reviewed the Parties' Stipulation, and good cause appearing therefor:


IT IS HEREBY ORDERED that

(1) The deadline for disclosure of rebuttal reports is extended to January 30, 2023.

(2) The deadline to complete expert discovery is extended to March 3, 2023.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: December 28, 2022



The Honorable Beth Labson Freeman
United States District Judge